

*** Filed ***
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U.S.D.C., Eastern District of New York

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

Case No.: 1:22-cv-1032 (PKC)(JRC)

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
DECLARATION OF GREGORY ELEFTERAKIS,
ROMAN POLLAK, JONATHON D. WARNER, ESQ.
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

**PRO SE DEFENDANT'S MOTION TO
SEAL PORTIONS OF ECF 510-1**

Defendants.
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Pro Se Defendant Safa Gelardi respectfully moves the Court pursuant to its inherent authority and Local Civil Rule 79.2 to seal a portion of the document filed as ECF Entry 510-1, and in support thereof states as follows:

1. On June 10, 2025, I filed an exhibit labeled as ECF Entry 510-1 in support of my opposition to Plaintiff's claims.
2. That exhibit contains a Profit and Loss Statement that includes personal and sensitive financial information which should not have been filed publicly.
3. The inclusion of this material was inadvertent and resulted from my status as a pro se litigant without formal legal training or access to counsel.
4. The remainder of the document does not contain confidential information and is critical to rebutting Plaintiff's factual misrepresentations about their client base and revenue.
5. Courts in this Circuit routinely permit sealing of personal financial records inadvertently disclosed. See *Gambale v. Deutsche Bank AG*, 377 F.3d 133, 143 (2d Cir. 2004).
6. I respectfully request that the Court ****seal only the Profit and Loss Statement portion**** of ECF 510-1 and allow the remaining materials to remain accessible as part of the public record.

WHEREFORE, I respectfully request that the Court grant this Motion and enter the proposed order attached hereto sealing only the Profit and Loss Statement in ECF 510-1.

Respectfully Submitted,

Safa Gelardi
Pro Se Defendant